

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

CARPENTERS FRINGE BENEFIT FUNDS OF	)	
ILLINOIS, <i>et al.</i> ,	)	CIVIL ACTION
	)	
Plaintiffs,	)	NO. 08 C 3346
	)	
vs.	)	HONORABLE RONALD A. GUZMAN
	)	
LONGSHORE/DALY, INC., a corporation,	)	MAGISTRATE JUDGE VALDEZ
	)	
Defendant.	)	

**INITIAL STATUS REPORT**

Pursuant to this Court's standing order, the Parties hereby submit this Initial Status Report with a proposed discovery schedule, and state as follows:

1. Plaintiffs, Carpenters Fringe Benefit Funds of Illinois, *et al.* ("Funds") brought suit pursuant to 29 U.S.C. §§ 1132 and 1145 of ERISA, against Defendant, Longshore/Daly, Inc., ("Longshore/Daly"), to recover unpaid contributions, liquidated damages, interest, costs and attorneys' fees from Defendant.

2. Counsel for the Funds and Longshore/Daly propose the following discovery schedule:

Initial disclosures due:	August 22, 2008
Deadline to amend pleadings and join parties:	October 31, 2008
Discovery to be completed:	October 31, 2008
Deadline for filing dispositive motions:	December 5, 2008

Longshore/Daly has filed its Answer acknowledging its obligations to the Funds, but is disputing the amounts that are due. The parties are actively engaged in settlement discussions, and anticipate that this matter will be resolved by a Settlement Agreement.

3. The parties have discussed, and would be willing to consent to proceed before the assigned Magistrate Judge.

Respectfully submitted,

s/Patrick N. Ryan  
One of the Attorneys for the Plaintiffs

Patrick N. Ryan  
BAUM SIGMAN AUERBACH & NEUMAN, LTD.  
200 West Adams Street, Suite 2200  
Chicago, IL 60606-5231  
Telephone: (312) 236-4316

Respectfully submitted,

s/ Thomas S. Moore  
One of the Attorneys for the Defendant

Thomas S. Moore  
ANDERSON & MOORE, P.C.  
111 W. Washington, Suite 1100  
Chicago, IL 60602  
Telephone: (312) 251-1500

**CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that on or before 5:00 p.m. on Tuesday, the 5th day of August 2008, he electronically filed, **Initial Status Report**, with the Clerk of Court using the CM/ECF system which will send an e-mail notification of such filing to the following:

Thomas S. Moore  
ANDERSON & MOORE, P.C.  
111 W. Washington, Suite 1100  
Chicago, IL 60602  
E-Mail: [email@andersonmoorelaw.com](mailto:email@andersonmoorelaw.com)

/s/ Patrick N. Ryan \_\_\_\_\_

Patrick N. Ryan  
Attorney for Plaintiffs  
BAUM SIGMAN AUERBACH & NEUMAN, LTD.  
200 West Adams Street, Suite 2200  
Chicago, IL 60606-5231  
Telephone: (312) 236-4316  
Facsimile: (312) 236-0241  
E-Mail: [pryan@baumsigman.com](mailto:pryan@baumsigman.com)